

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELIJAH BURTON, DONESHA BURTON, KELSEY FLEMING, QUINCY AUSTIN, and EDGAR TORRES, on behalf of themselves, individually, and on behalf of all others similarly-situated,

Plaintiffs,

-against-

CE SOLUTIONS GROUP, LLC, FLAGGING SPOTTING FLIPPING SERVICES INC., CE FLAGGING PLUS CORP., ARGANI INC., EDWARD SLININ, individually, DORA SLININ, individually, GARY SAMUEL, individually, and HASSAN SIBLINI, individually,

Defendants.

Docket No.: 1:22-cv-03213-JPO

**NOTICE OF ACCEPTANCE
OF RULE 68 OFFER OF
JUDGMENT**

PLEASE TAKE NOTICE that, pursuant to Rule 68 of the Federal Rules of Civil Procedure (“Rule 68”), Plaintiffs Elijah Burton, Donesha Burton, Kelsey Fleming, Quincy Austin, Edgar Torres, and Opt-in Plaintiffs Jorge Luis Rodriguez and Luis Jose Rodriguez, hereby provide Notice of their Acceptance of the Rule 68 Offer of Judgement served by Defendants CE SOLUTIONS, EDWARD SLININ, and DORA SLININ and attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 68 and *Yu v. Hasaki Rest., Inc.*, 944 F.3d 395 (2d Cir. 2019), notice of this acceptance has been served and that this filing, along with proof of that service, shall be deemed acceptance of the Rule 68 offer and the clerk must enter judgment thereof.

Dated: New York, New York
December 30, 2021

Respectfully submitted,
JOSEPH & NORINSBERG, LLC

By:


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Defendants.

PLAINTIFF'S
EXHIBIT

A

Docket No.: 1:22-cv-03213-JPO

OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants CE SOLUTIONS, EDWARD SLININ, and DORA SLININ, (collectively, “the CES Defendants”), hereby offer to allow judgment to be taken against them, jointly and severally, in the sum of two-hundred twenty-five thousand dollars (\$225,000.00), inclusive of all of Plaintiffs Elijah Burton, Donesha Burton, Kelsey Fleming, Quincy Austin, Edgar Torres, and opt-in Plaintiffs, Jorge Luis Rodriguez, and Luis Jose Rodriguez, for all claims for relief and damages, inclusive of attorneys’ fees and costs, and in full and final resolution of all claims against the CES Defendants arising out of, alleged in, or related to, the facts and transactions alleged in the above-captioned action.

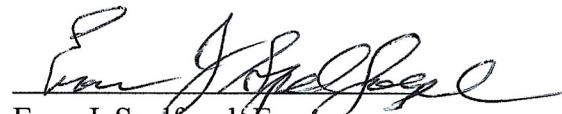
This Offer of Judgment is made for the purposes specified in Federal Rule of Civil Procedure 68, and neither this Offer of Judgment nor any judgment that may result from this Offer of Judgment shall be construed as an admission of liability on the part of the CES Defendants or proof that Plaintiffs have suffered any damages of any kind.

This Offer of Judgment is made pursuant to the provisions of Rule 68 of the Federal Rules of Civil Procedure, and shall be deemed withdrawn unless Plaintiffs serve written notice of their acceptance within fourteen (14) days of the date on which this Offer of Judgment was served. An offer not accepted within the specified time period for acceptance will be deemed withdrawn. Any evidence of this Offer of Judgment, whether accepted or not, shall be inadmissible except in a proceeding concerning its enforcement by either party.

Dated: New York, New York
December 16, 2022

PHILLIPS NIZER LLP

By:



Evan J. Spelfogel, Esq.

Jeremy Siegfried, Esq.

*Attorneys for Defendants CE Solutions,
Edward Slinin, and Dora Slinin*

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